

EXHIBIT 4

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

LINCOLN JONES, JR. and MUYESSER)	
NILE JONES, individually and as)	
trustees of the Lincoln and)	
M. Nile Jones Revocable Trust;)	
and PROJECT SENTINEL, INC.,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.
)	5:13-cv-02390-LHK
TRAVELERS CASUALTY INSURANCE)	
COMPANY OF AMERICA,)	
)	
Defendant.)	
_____)	

DEPOSITION OF PERSON MOST KNOWLEDGEABLE FOR TRAVELERS
CASUALTY INSURANCE COMPANY OF AMERICA, BRADLEY WOOD
Costa Mesa, California
June 17, 2014

Reported by:
DENISE HERFT
CSR No. 12983

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION
4

5 LINCOLN JONES, JR. and MUYESSER)
6 NILE JONES, individually and as)
7 trustees of the Lincoln and)
8 M. Nile Jones Revocable Trust;)
9 and PROJECT SENTINEL, INC.,)
10 Plaintiffs,)
11 vs.) Case No.
12 TRAVELERS CASUALTY INSURANCE) 5:13-cv-02390-LHK
13 COMPANY OF AMERICA,)
14 Defendant.)
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DEPOSITION OF PERSON MOST KNOWLEDGEABLE
FOR TRAVELERS CASUALTY INSURANCE COMPANY OF
AMERICA, BRADLEY WOOD, taken on behalf of the
Plaintiffs at 151 Kalmus Drive, Suite L-1,
Costa Mesa, California, commencing at 9:36 a.m. on
June 17, 2014, reported by DENISE HERFT, CSR No.
12983, pursuant to Notice.

1 Brancart, and I am the attorney who represents the
2 plaintiffs.

3 THE VIDEOGRAPHER: Will the court reporter
4 please swear in the witness.

5
6 BRADLEY WOOD,
7 called as a witness, and having been first duly sworn
8 by the Certified Shorthand Reporter, was examined and
9 testified as follows:

10

11 EXAMINATION

12 BY MR. BRANCART:

13 Q Sir, would you please state your full name
14 and spell it.

15 A First name Bradley, B-r-a-d-l-e-y, middle
16 name Quiring, Q-u-i-r-i-n-g, last name Wood,
17 W-o-o-d.

18 Q Mr. Wood, in the course of your work for
19 Travelers, you commonly go by the first name of
20 Brad; is that correct?

21 A That's correct.

22 Q Would you please state your current
23 business address.

24 A It is 21688 Gateway Center Drive, Diamond
25 Bar, California 91765.

1 limit this question to 25, what document do you
2 have that would provide an answer to topic number
3 25?

4 MR. PETERSON: Object to the form of the
5 question as stating the question; argumentative.

6 THE WITNESS: I don't know that we have a
7 document that says NIS, specifically sales
8 insurance to landlords who rent apartment
9 buildings.

10 BY MR. BRANCART:

11 Q Okay. Do you have any knowledge of that?

12 A I do.

13 Q And what is the knowledge you have?

14 A Just over the six or seven years of
15 working with the agency and the business that they
16 have submitted over that time has predominantly
17 been apartments.

18 Q Okay. Other than that, do you have any
19 other knowledge of the number or rate or percentage
20 of insurance policies placed by NIS with Travelers,
21 our Apartment Pac policies?

22 A I would believe it is significant and
23 probably north of 90 percent of our Apartment Pac.
24 They are recognized as an apartment writer for
25 Travelers, and I believe their Website mentions

1 habitational writings as their core product.

2 Q Okay. I'm going to show you Exhibit 85.

3 Can you identify what Exhibit 85 is?

4 A It's an agency production report that
5 highlights the premiums that the agency has placed
6 with Travelers. It also spells out new business
7 and losses and loss ratios for the current year to
8 date and prior full year. As you mentioned
9 earlier, if the agent did business with any other
10 business unit, there would be premiums indicated in
11 those other business units within BI.

12 Q This is a report for NIS; correct?

13 A Correct.

14 Q And NIS has a master agency code which is
15 upper left 0CHK04; correct?

16 A That's correct.

17 Q And any activity between Travelers and NIS
18 that results in issuance of a policy or
19 declinations or referrals is coded off of that --
20 receives that code; correct?

21 A Correct.

22 Q That information through the IENet or
23 Travelers Express is populated into some kind of
24 database electronically; true?

25 MR. PETERSON: Objection; lacks

1 procedures?

2 A Not to my knowledge.

3 Q Would you turn to the second page of
4 Exhibit 115, and it says, "Purpose," and the third
5 line there says, quote, The ARN has been expanded
6 to include all business insurance with the
7 exception of discovery Re national accounts and
8 Northland/Northfield; do you see that?

9 A Yes.

10 Q Why is it that -- what is it about these
11 accounts discovery Re national accounts and
12 Northland, slash, Northfield that excludes them
13 from the ARN procedure?

14 MR. PETERSON: Objection; no foundation;
15 beyond the scope.

16 THE WITNESS: I'm not sure.

17 BY MR. BRANCART:

18 Q What is the relationship between Travelers
19 and Northland/Northfield?

20 MR. PETERSON: Objection; beyond the
21 scope; no foundation.

22 THE WITNESS: Northland is a specialized
23 business unit that focuses on higher hazard type of
24 operations and one thing that comes to mind is
25 trucking. Why these three are specifically

I do solemnly swear under penalty of perjury
that the foregoing is my deposition under oath;
are the questions asked of me and my answers thereto;
that I have read same and have made the necessary
corrections, additions, or changes to my answers that I
deem necessary.

In witness thereof, I hereby subscribe my name
this _____ day of _____, 20____.

Bradley Wood

CERTIFICATE
OF
CERTIFIED SHORTHAND REPORTER

I, the undersigned, Certified Shorthand Reporter of the State of California do hereby certify:

That the foregoing proceedings were taken before me at the time and place therein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were placed under oath; that a verbatim record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; further, that the foregoing is an accurate transcription thereof.

I further certify that I am neither financially interested in the action nor a relative of employee of any attorney of any of the parties.

IN WITNESS WHEREOF, I have this date
subscribed my name Denise C. Herft.



Dated: June 17, 2014

Certificate Number 12983